



INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: P. Godin
W. Rines
D. Tarr
P. Tessier

FROM: S. Graham

{ Dept.
Branch
Division
Company

LOCATED AT: Leominster, Ma.

SUBJECT: VCM ALARM REDUCTION PLAN

DATE: December 6, 1983

VCM ALARM REDUCTION PLAN

The purpose of this plan is to work more effectively on problem areas of Fugitive VCM emissions. The method to be used will be the assignment of designated target areas to specific people within the department. It should be noted that even if you are not specifically assigned an area your normal contribution in this area is still expected. An assigned area will be investigated, and a written report will be produced that will lay out necessary steps that need to be taken to resolve or reduce the problem.

The number of alarm printouts of greater than 5ppm's or that have a duration - of 30 minutes or more will be used to monitor progress.

Below are listed the target areas, assignments, and comments about them;

- 1) Manhole covers - Assigned Personnel; Steve Graham, Don Tarr, Phil Tessier, Wayne Rines, and Paul Godin. This is the number one problem for all the above listed personnel. Possible solutions are;
 - A. Gasket change - Contacted Malcolm McKenzie through Reggie Doherty. He is an area representative for our gasket manufacturer. A model gasket will be made that will have a lower lip for support and alignment. He will call me with a price quote and the gasket should be ready in mid January.
 - B. Air Pressure - A minimum of 85 psi is needed for proper air gun efficiency. 90psi would be more desirable.
 - C. Air Guns - Air guns must be effectively maintained and adequate spares provided to ensure enough properly working guns.
 - D. Lugs and Washers - Must be in good working order and in adequate supply for manhole covers.
 - E. Poor Covers - Need to be identified and resurfaced.
 - F. Operators - Will need retraining where indicated.
- 2) Undetermined - In order to limit the number of undetermined alarms it appears necessary to monitor stack 300. Sample results from the stack show high readings correlate with use of universal jet and times of manhole cover leaks. The proper control of the two sources would allow readings of below 10ppm's at stack.

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At present since stack 300 has not been monitored on a regular basis the readings are higher than if some control efforts would be put on it. A high level of emissions at stack 300 will result in various alarms that have otherwise been listed as undetermined. (Assigned Personnel: Steve Graham).

- 3) Transfer System - The two most frequent transfer associated leaks are sampling of batches and cleaning of transfer baskets. Bldg. #1 exhaustor system needs upgrading. Improvement of sampling technique is also possible. A work order has been submitted to upgrade Bldg. #1 lower exhaustor system. (Assigned Personnel: Wayne Rines).
- 4) Slurry Columns - The bump and flush of the slurry strippers often give numerous alarms. This area needs investigation. (Assigned Personnel: Don Tarr).
- 5) Chem. Add Valves - Either upgrade valves or the use of some sort of screw in plug will be investigated. (Assigned Personnel: Steve Graham).
- 6) Unloading Stations - Swivel joints and tank car connections are sources of leaks. Investigate method to reduce these areas. (Assigned Personnel: Paul Godin)


Stephen P. Graham
E.P.A. Coordinator

SPG/cmb

cc: D. L. Young
S. Graham